

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Case No. 20-16375
Kelvin L Brown)	Chapter 13
)	Judge: LaShonda A. Hunt
Debtor)	

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Kelvin L Brown
904 Gardner St.
Joliet, IL 60433-2436

DAVID M SIEGEL
790 CHADDICK DR
WHEELING, IL 60090

Please take notice that on October 23, 2020 at 10:45 am, a representative of this office shall appear before the Honorable Judge Lashonda A. Hunt, and present the motion a copy of which is attached.

This motion will be presented and heard telephonically using AT & T Teleconference. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must call in to the hearing using the following information - **Toll Free Number: 1-888-557-8511; Access Code: 7490911.**

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on October 16, 2020.

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Dana Twombly

FOR: Glenn Stearns, Chapter 13 Trustee

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MOTION TO DISMISS FOR UNREASONABLE DELAY AND FAILURE TO MAKE PLAN PAYMENTS

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Friday, August 28, 2020.
2. The Debtor has failed to:
 - a. Provide proof of filing tax returns for 2019, 2018, 2017, 2016.
 - b. Conclude the regularly scheduled Section 341 Creditor Meeting.
 - c. Commence making timely plan payments.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Respectfully Submitted;

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Gerald Mylander
FOR: Glenn Stearns, Chapter 13 Trustee

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